

EXHIBIT 3

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February 8, 2011

BY ELECTRONIC MAIL

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Re: Electronic Discovery

Dear Terry:

I write in response to your email letter of February 4, 2011. I will use the same numbered paragraphs as we have used in our previous letters.

1. We will search from January 1, 1996, to December 31, 2006, for both hard copy and electronic documents. We will not search after 2006. We are still searching for hard copy documents in Colombia and in Birmingham. Given the breadth of your 119 document requests, the ten-year relevant time frame, and the fact that these documents are located in two countries and partially in Spanish, I do not think it should surprise you that our search is not yet complete.

7. We will consider any synonyms you wish to suggest. As of now, we are not including any search terms in addition to the ones to which we agreed in our January 28 letter. (We agreed to include "attack," "massacre," "terrorize" and "terrorism.")

8. We have already agreed to use general search terms to find documents that refer to paramilitaries—such as "AUC," "Juan Andres Alvarez Front" and "paramilitaries"—in addition to the specific names on our list. We will produce all relevant documents that include these general terms, even if the documents also mention the name of paramilitaries for which you have not previously requested documents. I think this should address the concern you raise in your letter. We will not, however, separately search for documents using the search terms you suggested in paragraph 8 related to the Justice & Peace Process.

9. We agree with your suggested compromise.

14. With respect to the inclusion of those additional names of corporations, your reference to Request No. 14 of our Second Set of Interrogatories makes little sense. As you will recall, you did not provide an answer to that interrogatory but claimed this information was protected by the work product doctrine. Have you now withdrawn that objection? If you will provide us with a revised interrogatory response reflecting that these are the companies from

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which you allege Drummond raised funds for the AUC, we will include those company names as search terms.

15. If you provide us with a list of street names you wish us to include, we will consider including them as search terms. This seems like a reasonable compromise but we need to see the proposed search terms before we can agree.

You also raised two additional issues in your letter.

First, as to the hard copy documents, we should be able to produce an additional group of hard-copy documents by the end of this week. We are still completing our search for responsive hard copy documents. As for the electronic documents, I cannot give you an estimate right now as to how long it will take to produce them. We have not yet run the search terms—because we are still working with you to finalize the list—so we do not know how many documents will need to be individually reviewed for privilege and responsiveness. As we have done with the hard-copy documents, we will produce the electronic documents to you in a rolling production so you can review a portion of them while we continue to review additional documents.

Second, we will send you our revised discovery responses by the end of next week. We expect you will do the same, as you agreed to reconsider several of your objections to these requests.

Please let me know if you have any questions.

Sincerely,



Sara E. Kropf

cc: All counsel of record (via electronic mail)